## REMARKS/ARGUMENTS

The office action of January 16, 2004 has been carefully reviewed and these remarks are responsive thereto. Reconsideration and allowance of the instant application are respectfully requested. Claims 1-35 remain pending in this application.

Claim 17 has been amended to correct a minor informality.

Claims 1-31 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. patent no. 5,727,155 to Dawson ("Dawson") in view of U.S. patent no. 5,933,822 to Braden Harder et al. ("Braden-Harder"); and claims 32-35 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the combination of Dawson and Braden-Harder further in view of U.S. patent no. 6,226,640 to Ostrovsky et al. ("Ostrovsky"). Applicants respectfully traverse these rejections.

***Claims 1-16***

The action contends that Dawson describes a host and remote system each including their own display device and a "remote application (360), which maintains a list of display locations belonging to shared applications. See Fig. 3 & col. 6, lines 33-41." The action also alleges that Dawson shows that a remote system user can "perform modifications and subsequent transmissions to the host computer (200). See col. 8, lines 34-43." While applicants agree with the above statements regarding Dawson, beyond the implication that Dawson shows the elements in the preamble of claim 1, the action has failed to identify any correspondence between the claim language and the disclosure of Dawson. The action does however acknowledge that "Dawson does not teach forming a query at the remote device such that execution of a query is to cause an application associated with an event to be launched by the host computer." To remedy this defect, the action relies on Braden-Harder.

Applicants are at a loss as to understand how the action is applying Dawson to claim 1. For example, applicants do not see how the action contends that Dawson teaches or suggests the claim 1 steps of:

> providing at the remote peripheral device notification of an event received from a source application at the host computer;

responsive to a first user input at the remote peripheral device, displaying on the auxiliary display unit information associated with the event;

This makes determining how Braden-Harder could have been combined with Dawson particularly onerous. Consequently, irrespective of whether Braden-Harder discloses what the action suggests, Applicants submit that the action has not established a *prima facie* case of obviousness with respect to claim 1.

As to Braden-Harder, the action states and applicants agree that fig. 2 shows a user entering a query (201) to a browser (420) which sends the query through the internet to a server (220) having a search engine (225), which processes the query and returns a result to the browser. In combining, Dawson and Braden-Harder, the action contends that one skilled in the art would have modified the remote-host computer system of Dawson to adapt the use of query (201) and search engine (225) shown in Fig. 2 of Braden-Harder. The action avers that one skilled in the art would have been motivated to combine Dawson and Braden-Harder since Braden-Harder suggests "that the system of Fig. 2 including the use of query and a search engine (225) equivalently provide the desired execution of a query and launching of an application by the host computer. The use of a query and search engine (225) helps function a client-server system as taught by Braden." Again the action has left applicants with statements about combining the references which have little correlation to the language of the claims.

In applying Braden-Harder, the action apparently contends that the server (220) is a host computer, and computer system 300, which can be a PC, is a remote peripheral device. Further, the action seemingly alleges that a user entering a query (201) to a browser (420) in the computer system 300 as described in Braden-Harder meets the step of forming a query based upon the first user input. Also, the action apparently believes that the query being sent through the Internet to a server (220) having a search engine (225) which operates to return a set of statistically retrieved document records satisfies the claim recitation of "responsive to a second user input at the remote peripheral device, executing the query to cause the source application to be launched by the host computer" as recited in claim 1. This position is flawed however. Assuming, but not admitting, that Braden-Harder shows forming a query based on first user input, the act of a user entering a query to a browser which causes a remote server's search engine to perform a search

would collectively only constitute a first input as the query would not be defined until the user informs the system of the query by pressing the enter key. Thus, Braden-Harder does not provide a teaching or suggestion of executing the query *responsive to a second user input* as recited in claim 1.

Moreover, the rejection would appear to rely on the search engine described in Braden-Harder as the source application launched by the host computer as recited in claim 1. However, claim 1 also calls for the step of providing at the remote peripheral device notification of an event received from a source application at the host computer. As discussed above, applicants do not understand how nor believe that Dawson teaches or suggests providing at the remote peripheral device notification of an event received from a source application at the host computer as claimed. In any event, it also unclear as to how notification of an event received from a search would be provided at the peripheral device. Consequently, the combination of Dawson and Braden-Harder, even if proper, does not result in applicant's claim 1 invention.

Applicants submit that neither Dawson nor Braden-Harder alone or in combination are even remotely related to applicants' invention. The following discussion of an illustrative embodiment of claim 1 is provided to further exemplify the differences between the combination of Dawson and Braden-Harder and the claim 1 invention. According to an illustrative embodiment of the claim 1 invention shown in Fig. 4 and described, *inter alia*, in paragraph [50], at a remote peripheral device, a notification of an event in the form of receipt of a message is provided from a source (e.g., messaging) application at the host computer. Then, in response to user input navigating through a messaging application at the remote peripheral device, the auxiliary display unit on the remote peripheral device displays information (e.g., a message) associated with the event. Next, a navigation query is formed based upon the user input navigating through the messaging application at the remote peripheral device, and responsive to another user input (e.g., a button actuation of Open on PC), executing the navigation query causing the source (e.g., messaging) application to be launched by the host computer.

One of the advantages that can be realized by applicants' claim 1 invention is that the user does not need to "replicate" the events/activities carried out to get to the same context point on the host computer which has already been reached at the remote peripheral device. Nothing in

Dawson or Braden-Harder describes or recognizes this advantage much less the ability to minimize the steps required to reach the same context on the host computer, which has already been reached on the remote peripheral device.

Claims 2-16, which depend from claim 1, are patentably distinct over the applied art for the same reasons as claim 1, and further in view of the novel features recited therein. For example, claim 4 recites that the event represents receipt of a calendar message, whereas Braden-Harder merely describes entering a query into a browser and having a search engine conduct a search. Claim 6 recites that the notification comprises an audio signal. No teaching or suggestion of a notification being an audio signal is contemplated in either Dawson or Braden-Harder; the action baldy asserts that it would have been obvious that the notification could be an audio signal. Claims 10 and 12 call for the source application to be a calendar application and messaging application, respectively. In contrast as Braden-Harder is applied, the only application which could even remotely be considered as a source application would be the search engine since Braden-Harder is cited for allowing a user to enter a query. Regarding claim 13, the action fails to identify a teaching or suggestion that it would have been obvious that the event is a news event and the information includes news information. Claim 16 calls for, among other features, displaying on the auxiliary display unit a plurality of first soft labels representing a plurality of applications and responsive to actuation of a first button on the remote peripheral device associated with one of the first soft labels representing the application, displaying on the auxiliary display unit a plurality of second soft labels, each second soft label representing a different function within the application, the second soft labels replacing the first soft labels on the auxiliary display unit. Neither Dawson nor Braden-Harder however, teach or suggest displaying "soft labels" on the auxiliary display unit much less anywhere. Moreover, neither Dawson nor Braden-Harder teaches or suggests that a button on the remote peripheral device is associated with the one of the soft labels as claimed.

***Claims 17-30***

Claim 17 calls for, among other features, providing first information in a context at the first input/output device in response to a first user input; forming a query associated with providing the first information in the context at the first input/output device; and responsive to a

second user input, launching an application based on the query to provide second information in the context at a second input/output device. The action applies Dawson and Braden-Harder to claim 17 in the same manner as they are applied to claim 1; again, without specifically tying the references to the claim language.

In any event, while Braden-Harder shows a user entering a query, nowhere does Braden-Harder teach or suggest forming a query associated with providing first information in a context a first input/output device as called for in claim 17. Furthermore, even assuming, but not admitting, that Braden-Harder shows forming a query as claimed, the act of a user entering a query to a browser which causes a remote server's search engine to perform a search would not in any way constitute a second input as claimed because the query would not be formed until the user informs the system of the query by pressing the enter key. Thus, Braden-Harder does not provide a teaching or suggestion of launching an application based on the query to provide information in the context at the second input/output device *responsive to a second user input* as recited in claim 17.

One of the advantages realized by the claim 17 invention is that a user can launch an application based on the query to provide information in the context when desired and to avoid the need to manually replicate the steps required to provide the second information at the host computer. This problem does not exist with the Dawson system. Significantly, according to Dawson at col. 5, lines 38-46,

> The shared application(s) run on host system 200. What appears on display device 225 of remote system 220 is a duplicate image of what is displayed on display device 205 of host system 200. This image is transferred to remote system 220 from host system 200. All mouse and keyboard movements on the shared application(s) entered by the user of remote system 220 are executed on host system 200, subject to the access level accorded to remote system 220, as discussed below.

Hence, in an unlocked mode, Dawson provides a mirror image on the remote system display device of what is currently appearing on the host system display. Thus, no motivation exists to build a query and provide information in the same context when the shared application provides information in the same context in real time. Accordingly, Applicants submit that one would not

have been motivated to combine Braden-Harder with Dawson to realize the invention of claim 17. For this reason, the combination of Dawson and Braden-Harder is not proper.

Claims 18-31, which ultimately depend from claim 17, are patentably distinct from the proposed combination of Dawson and Braden-Harder for the same reasons as their base claim and further in view of the novel features recited therein. For example, claim 20 calls for the second information including richer content than the first information. Dawson provides a mirror image on the remote system display device of what was appearing on the host system device, thus the information is identical. There is no motivation or incentive to modify the content to be richer in Dawson, Braden-Harder or otherwise. Claims 27 and 28 each call for the first and second information to be news information. Neither Dawson nor Braden-Harder contemplates information including news information. Moreover, claim 27 recites that the first information includes a news story headline and only the second information includes the news story, and claim 28 calls for the first information to include an abstract of a news story and only the second information to include a full version of the news story. To the contrary, Dawson does not contemplate anything other than identical information for a shared application to appear on the host and remote display. In addition, claim 30 recites that the second user input identifies an input/output device type, and responsive to the second user input, determining that the second input/output device type is the closest input/output device to the first input/output device of the identified type. To show this element, the action states that Braden-Harder describes a client PC comprising input and output interfaces. Nonetheless both Braden-Harder and Dawson are wholly devoid of any teaching or suggestion of determining that the second input/output device type is the closest input/output device to the first input/output device of the identified type as claimed.

***Claims 32-35***

Claim 32 calls for storing a sequence of activations input to the auxiliary user interface to obtain a context on the auxiliary interface, building a query from the sequence of activations, the query being understood by the host computer and responsive to a single activation input to the main user interface or the auxiliary interface, executing the query to provide the context on the main user interface.

The action has failed to establish a case of *prima facie* obviousness with respect to claim 32. Rather the action continues to make allegations regarding obviousness of the claim 32 invention without identifying any correspondence between the claim language and the disclosures of Dawson and Braden-Harder. The action has merely supplemented the assertions made regarding Dawson and Braden-Harder discussed above with respect to claim 1 with statements about Ostrovsky absent any correspondence with the claim language.

More specifically, the action acknowledges that Dawson and Braden-Harder do not teach a sequence of activations and building a query from the sequence of activations. In an attempt to remedy these defects, the action relies on Ostrovsky. In particular, the action relies on col. 4, lines 38-40 and fig. 2 alleging that Ostrovsky shows a database (120) in which a memory (210) includes a data storage (220) and query processor (220), the query processor including instructions in the form of software that a processor executes. Then, the action purports that one would have modified "Dawson's computer system to adapt Ostrovsky's query processor (215) including the software. One would have been motivated in view of the suggestion in Ostrovsky that the query processor (215) as configured in Fig. 2 equivalently provides the desired formation of a query from a sequence of activations."

Applicants have found no teachings or suggestion in Dawson, Braden-Harder or Ostrovsky alone, or in combination, of storing a sequence of activations input to an auxiliary user interface to obtain a context. Ostrovsky is far a field from the invention of claim 31. Particularly, Ostrovsky describes a method for determining approximate hamming distance and approximate nearest neighbors of a query. The fact that Ostrovsky generally describes a query processor 215, which includes instructions in the form of software executable by a processor, does not in any way suggest that the instructions are even remotely analogous to a sequence of activations. Also, there is no suggestion that the instructions obtain a context on the auxiliary user interface. Nor does a query including software instructions executed by a computer have any relationship to the claim step of building a query from the sequence of activations. In view of the above, the combination of Dawson, Braden-Harder and Ostrovsky, even if proper, result in the invention of claim 32.

Moreover, one of the advantages realized by the claim 32 invention is that a query can be built from a sequence of activations and executed, in response to a single activation, to provide the context on a main user interface of a host computer without a user having to manually replicate the sequence of activations required to provide the context on the auxiliary user interface. This problem does not exist with the Dawson system because, in an unlocked mode, Dawson provides a mirror image on the remote system display device of what is currently appearing on the host system display. Applicants submit that one would not have been motivated to combine Braden-Harder and Ostrovsky with Dawson to realize the invention of claim 32. See Dawson col. 5, lines 38-46. Tellingly, no motivation or need exists to build a query and execute the query to provide information in the context when in Dawson the shared application provides information in the same context in real time. For this reason, one would not have been motivated to combine Dawson, Braden-Harder and Ostrovsky to obtain the claim 32 invention.

Claims 33-35, which ultimately depend from claim 32, are patentably distinct over the art of record for the same reason as claim 32, and further in view of the advantageous features recited therein.

## CONCLUSION

It is believed that no fee is required for this submission. If any fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

All rejections having been addressed, applicants' respectfully submit that the instant application is in condition for allowance, and respectfully solicit prompt notification of the same.

Respectfully submitted,

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